

Melissa Newel (#148563)  
NEWEL LAW  
2625 Alcatraz Ave., Suite 132  
Berkeley, CA 94705  
(510) 316-3827  
mnewel@newellawfirm.com

Attorney for Plaintiff  
MELANIE PAIGE CARLSON

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

MELANIE PAIGE CARLSON,  
Plaintiff,

v.

KILOLO KIJAKAZI,  
ACTING COMMISSIONER OF  
SOCIAL SECURITY,  
Defendant.

No. 1:23-CV-00451 (BAM)

**STIPULATION FOR BRIEFING  
EXTENSION; ~~PROPOSED~~ ORDER**

On March 24, 2023, Plaintiff Melanie Paige Carlson filed the instant civil action for judicial review of the defendant Commissioner of Social Security's decision denying her application for Social Security disability benefits. (ECF Doc. 1) The Defendant responded to Plaintiff's Complaint on May 30, 2023. (ECF Doc. 11) Pursuant to the Court's Scheduling Order, the parties stipulated to a first-time 30-day extension of time for Plaintiff to file her motion for

1 summary judgment. (ECF Doc.12) Plaintiff's motion for summary judgment is currently due to  
2 be filed on or before July 30, 2023. (ECF Doc. 11 and 12)

3 Plaintiff now requests a second extension of sixty (60) days to file her motion. (ECF Doc.  
4 5 at p.3:17-18) Plaintiff's counsel seeks the briefing extension due to unexpected travel and  
5 assistance to an elderly parent. A sixty (60) day extension is sought due to the uncertainty of the  
6 circumstances prompting the request and to minimize conflicts with existing filing deadlines  
7 before this Court. Plaintiff's counsel apologizes to the Court for any inconvenience caused by the  
8 extension request. The defendant has no objection to the requested extension.

9  
10 Dated: July 26, 2023

Respectfully submitted,

NEWEL LAW

11 By: Melissa Newel

12 Melissa Newel

13 Attorney for Plaintiff

MELANIE PAIGE CARLSON

14  
15 Dated: July 26, 2023

PHILLIP A. TALBERT

United States Attorney

16 MATTHEW W. PILE

Associate General Counsel

17 Office of Program Litigation, Office 7

18 By: Justin L. Martin

19 JUSTIN L. MARTIN

Special Assistant United States Attorney

20 Attorney for Defendant  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

Good cause having been shown, IT IS ORDERED that Plaintiff shall be granted an extension of time of sixty (60) days to file her motion for summary judgment. The motion for summary judgment shall be filed on or before September 28, 2023. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: July 27, 2023

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE